



DEPARTMENT OF THE ARMY
U.S. ARMY ENGINEER DISTRICT, HONOLULU
FORT SHAFTER, HAWAII 96858-5440

REPLY TO
ATTENTION OF:

CEPOH

1 October 2001

Memorandum for Record

Subject: Response to the Guam Environmental Protection Agency comments on the Focused Feasibility Study and Proposed Plan for Remediation of the PCB contaminated soils at the Tanapag Village, Saipan, CNMI.

A number of proposed alternatives require transshipment and short-term storage of PCB contaminated soil and/or filter cake on Guam. Any such actions will require a permit and permission from our Agency. At the present time, Guam EPA has insufficient information on what the Corps' detailed plans are to confidently say whether we would permit such actions. We do not believe that associated costs and risks during storage on Guam were factored into the comparative analysis of options. We would insist on having this done. Other options, such as hiring a U.S. flag carrier for direct CNMI to the U.S.-mainland shipment should be evaluated in light of our concerns.

We agree that the logistical difficulties with shipping 20,000 tons of PCB contaminated soils from Saipan through Guam to the US Mainland are substantial and significant. This is not a viable alternative and we have dismissed it.

The recommended remedy involves treatment of the contaminated soil on Saipan to reduce the quantity to 400 tons of filter cake, which will be contaminated and will require transportation to the US mainland through Guam. We will comply with all US Department of Transportation regulations and with the applicable requirements of the Guam Government. We would appreciate being provided a contact person in GEPA to help us work through the issues involved in executing this remedial action, insofar as it may involve transit through Guam.

For current information on the remedial action, please refer to the revised draft Interim Draft traffic and Transportation Plan, August 2001, enclosed.